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September 23, 2020

**VIA ECF**

The Honorable Stuart M. Bernstein  
United States Bankruptcy Judge  
Southern District of New York  
One Bowling Green  
New York, NY 10004-1408

*Re: Irving H. Picard v. James Greiff, Adv. Pro. No. 10-04357*

Dear Judge Bernstein:

We are counsel to Irving H. Picard, trustee (the “Trustee”) for the substantively consolidated liquidation proceedings of Bernard L. Madoff Investment Securities LLC and the estate of Bernard L. Madoff under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa–lll. The parties are scheduled to appear before Your Honor at a follow-up pre-trial conference on Tuesday, September 29, 2020 at 10:00 a.m.

At the omnibus hearing held on July 29, 2020, this Court instructed the parties to submit the proposed Joint Pretrial Order prior to the next scheduled conference date, at which time trial would be scheduled. While the parties have made progress towards completing the Joint Pretrial Order, the parties need additional time to finalize the proposed order and to review the stipulations and/or objections concerning the proposed exhibits to be used for trial. Accordingly, the parties jointly request that the conference be adjourned to the next omnibus hearing scheduled for Wednesday, October 28, 2020, or as soon thereafter at the Court’s convenience.

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Thank you for the Court's consideration of this request and please have a member of Your Honor's staff contact the undersigned if the Court has questions or requires further information.

Respectfully submitted,

*/s/ Nicholas J. Cremona*

Nicholas J. Cremona  
Partner

cc: (via email)  
Arthur Ruegger, Esq.